

EXHIBIT “19-A”

2. Westmount Group, Inc. has a justiciable interest in this suit because it is the owner of funds which have been ordered to be tendered into the registry of the court.

3. Westmount Group, Inc. was incorporated on December 7, 2012. It has multiple shareholders. It is in the business of owning real estate and engaging in lending.

4. On July 17, 2020, Westmount Group, Inc. received two deposits of funds which it used to open brokerage accounts with Wells Fargo Bank in the amounts of approximately \$700,000 and \$338,000 as shown by Exhibit A.

5. On August 7, 2020, Westmount Group, Inc. signed a line of credit with Wells Fargo Bank, a true and correct copy of which is attached as Exhibit B.

6. On September 16, 2020, Plaintiff Albert Flores filed this action.

7. At a later date, Fidelity National Title Insurance Company and WestStar Title, LLC intervened in this action.

8. On or about April 21, 2021, Fidelity and WestStar filed a Joint Motion to Compel Interpleaders of Funds Into Registry of Court.

9. The Court granted the Motion without a hearing on April 26, 2021.

10. Although the funds sought to be interpleaded were the property of Westmount Group, Inc., Westmount was not made a party to the motion nor was it given notice.

11. Notwithstanding the filing of several motions for reconsideration, the Court has continued to order that the funds belonging to Westmount Group, Inc. be deposited into the registry of the Court.

12. The Court should vacate the Orders requiring deposit of funds into the registry of the Court for the following reasons:

- a. The orders are void for lack of jurisdiction. Westmount Group, Inc. is the owner of the funds in question. It was not made a party to the proceedings or given notice that its pecuniary interests were being threatened. Notice to Westmount's shareholder Keyvan Parsa is insufficient because there has not been any finding or allegation that Westmount is the alter ego of Dr. Parsa.
- b. A Motion to Compel Interpleader does not exist under the Texas Rules of Civil Procedure. Tex.R.Civ.P. 43 allows a person having claims against the plaintiff to be joined and required to interplead when the plaintiff may be subject to multiple claims. That is not the case. Intervenor does not assert claims against Plaintiff Albert Flores or Third Party Plaintiffs Fidelity or WestStar Title.
- c. Westmount Group cannot be compelled to deposit the funds as security for any future judgment. This is prohibited by the Supreme Court decision in *Grupo Mexicano De Desarrollo v. Alliance Bond Fund*, 527 U.S. 308 (1999). Additionally, there are no claims pending against Westmount Group.
- d. Requiring Westmount Group to deposit its funds into the registry will work an undue hardship upon Westmount. It has pledged the funds in question to secure a line of credit to Wells Fargo Bank. If Westmount delivers the funds, it will be in breach of its agreements with Wells Fargo Bank and will be forced out of business.

WHEREFORE, PREMISES CONSIDERED, Westmount Group, Inc. prays that the Court vacate any and all orders compelling it to deposit funds into the registry of the court, either

directly or indirectly, and for such other and further relief, at law and in equity to which it may be entitled.

Respectfully Submitted,

BARRON & NEWBURGER, P.C.
7320 N. Mopac Expy, Suite 400
Austin, Texas 78731
(512) 649-3243
(512) 476-9253 Facsimile

/s/ Stephen W. Sather
Barbara M. Barron (SB No1817300)
Stephen Sather (SBN 7657520)
ATTORNEY FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on this the 16th day of July 2021.

All Counsel of record by electronic filing manager.

/s/Stephen W. Sather
Stephen W. Sather

Institutional Class shares

Asset
Management

100% Treasury Money Market Fund

All information is as of 12-31-20 unless otherwise indicated. Information is subject to change.

Key Facts	
S&P Rating	AAAm
Moody's Rating	Aaa-mf
Share Class	Institutional
Investment Minimum	\$10 million
Ticker	WOTXX
CUSIP	94988A759
Gross Expense Ratio	0.23%
Net Expense Ratio	0.20%
Total fund assets	\$18.9 billion
Fund Manager	Laurie R. White, Jeffrey L. Weaver, CFA, Michael C. Bird, CFA
Fund Inception Date	12-03-90
Class Inception Date	10-31-14
Trading deadline	1 p.m. Eastern Time

Performance	
Current yield as of 12-31-20	
	7-day SEC yield (%)
	0.01
Month	30-day current yield (%)
December 2019	1.46
January 2020	1.42
February 2020	1.41
March 2020	0.91
April 2020	0.25
May 2020	0.09
June 2020	0.05
July 2020	0.05
August 2020	0.01
September 2020	0.01
October 2020	0.01
November 2020	0.01
December 2020	0.01

Average annual total returns (%) as of 12-31-20				
1 year	3 year	5 year	10 year	Since Inception
0.36	1.35	0.98	0.49	2.30

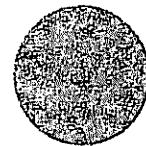
The Manager has contractually committed through May 31, 2021, to waive fees and/or reimburse expenses to the extent necessary to cap the fund's total annual fund operating expenses after fee waivers at the amounts shown above. Brokerage commissions, stamp duty fees, interest, taxes, acquired fund fees and expenses (if any), and extraordinary expenses are excluded from the expense cap. The Manager may also voluntarily waive or reimburse additional fees and expenses, and such voluntary waivers may be discontinued or modified at any time without notice. Without these reductions, the fund's seven-day current yield would have been -0.09%. Prior to or after the commitment expiration date, the cap may be increased or the commitment to maintain the cap may be terminated only with the approval of the Board of Trustees. The expense ratio paid by an investor is the net expense ratio (the total annual fund operating expenses after fee waivers) as stated in the prospectus.

Figures quoted represent past performance, which is no guarantee of future results and do not reflect taxes that a shareholder may pay on an investment in a fund. Investment returns will fluctuate. The fund's yield figures more closely reflect the current earnings of the fund than the total return figures. Current performance may be lower or higher than the performance data quoted and assumes the reinvestment of dividends and capital gains. Current month-end performance is available at the fund's website, wfam.com.

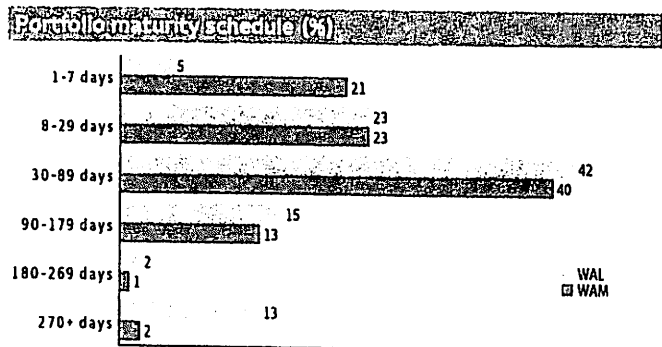
Money market funds are sold without a front-end sales charge or contingent deferred sales charge. Other fees and expenses apply to an investment in the fund and are described in the fund's current prospectus.

Principal Investment Strategies
Seeks current income exempt from most state and local individual income taxes, while preserving capital and liquidity. Invests in high-quality, short-term money market instruments that consist of U.S. Treasury obligations.

Portfolio Composition
% of portfolio
Treasury debt: (100)



Total: 100%



Money market fund statistics
Weighted average maturity: 53 days
Weighted average life: 110 days
Daily liquid assets: 100%
Weekly liquid assets: 100%

(Continued on next page.)



Advisors

Wells Fargo Advisors
MAC H0005-035
One North Jefferson Avenue
St. Louis, MO 63103

January 14, 2021

Westmount Group, Inc.
7604 Plaza Redonda Drive
El Paso, TX 79912-8402

RE: Verification of Assets for Account [REDACTED]

Dear Westmount Group, Inc.:

This letter confirms that:

- (i) You maintain a brokerage account with Wells Fargo Clearing Services, LLC ("Wells Fargo Advisors"), numbered [REDACTED] ("Account"), established on 07/20/2020;
- (ii) As of 01/13/2021, the Account maintains a total account value in excess of \$700,000.00.

This letter is provided for informational purposes and does not represent future Account value, if your Account will remain with Wells Fargo Advisors in the future, any purposes not mentioned in this letter, or the creditworthiness of the person(s) referenced within. Wells Fargo Advisors will have no liability with any party's reliance on this letter or the information within.

Sincerely,

Denise Gilles

Denise Gilles
Securities Operations Services Specialist 3
Client Mailings – Verifications & Inquiries

Investment and Insurance Products are:
• Not Insured by the FDIC or Any Federal Government Agency
• Not a Deposit or Other Obligation of, or Guaranteed by, the Bank or Any Bank Affiliate
• Subject to Investment Risks, Including Possible Loss of the Principal Amount Invested



Institutional Class shares

**WELLS
FARGO****Asset
Management**

100% Treasury Money Market Fund

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Key facts

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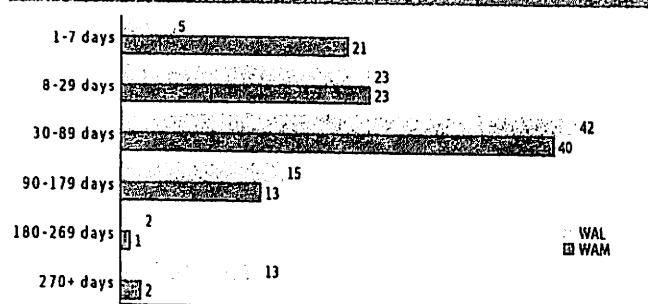
Portfolio composition

% of portfolio

Treasury debt: (100)



Total: 100%

Portfolio maturity schedule (%)**Money market fund statistics**

Weighted average maturity: 53 days

Weighted average life: 110 days

Daily liquid assets: 100%

Weekly liquid assets: 100%

(Continued on next page.)



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- (i) You maintain a brokerage account with Wells Fargo Clearing Services, LLC ("Wells Fargo Advisors"), numbered [REDACTED] ("Account"), established on 07/20/2020;
- (ii) As of 01/13/2021, the Account maintains a total account value in excess of \$338,000.00.

This letter is provided for informational purposes and does not represent future Account value, if your Account will remain with Wells Fargo Advisors in the future, any purposes not mentioned in this letter, or the creditworthiness of the person(s) referenced within. Wells Fargo Advisors will have no liability with any party's reliance on this letter or the information within.

Sincerely,

Denise Gilles

Denise Gilles
Securities Operations Services Specialist 3
Client Mailings – Verifications & Inquiries

Investment and Insurance Products are:
• Not Insured by the FDIC or Any Federal Government Agency
• Not a Deposit or Other Obligation of, or Guaranteed by, the Bank or Any Bank Affiliate
• Subject to Investment Risks, Including Possible Loss of the Principal Amount Invested



Signature Page

WESTMOUNT GROUP, LLC
PRIORITY CREDIT LINE
7604 PLAZA REDONDA DR
EL PASO TX 79912-8402

Sub Firm #	BR Code	FA Code	Account Number
20	TK	TK2Y	xxxx -0087
Account Type			
C-Corporation-privately owned			

BY SIGNING THIS PAGE, I/WE ("I") ACKNOWLEDGE THAT I HAVE RECEIVED AND REVIEWED A COPY OF MY/OUR INVESTMENT PROFILE(S) INCLUDED IN THIS PACKAGE AND I HAVE READ AND AGREE TO BE BOUND BY THE AGREEMENTS AND/OR DOCUMENTS LISTED BELOW AND ANY OTHER AGREEMENTS AND DOCUMENTS THAT ARE INCORPORATED BY REFERENCE INTO SUCH AGREEMENTS AND/OR DOCUMENTS.

020 - New Account Application, WBS - 1001
024 - Supplemental Account Owner Documentation
131 - Trusted Contact Authorization, WFA - ICED

I UNDERSTAND AND ACKNOWLEDGE THAT INVESTMENTS AND INSURANCE PRODUCTS IN MY BROKER-DEALER ACCOUNT:

- ARE **NOT** INSURED BY THE FDIC OR ANY FEDERAL GOVERNMENT AGENCY
- ARE **NOT** A DEPOSIT OR OTHER OBLIGATION OF, OR GUARANTEED BY, THE BANK OR BY ANY BANK AFFILIATE
- ARE SUBJECT TO INVESTMENT RISKS, INCLUDING POSSIBLE LOSS OF PRINCIPAL AMOUNT INVESTED

I agree to promptly review and immediately advise Wells Fargo Advisors if any of the Owners and/or Account Profile information is not accurate or becomes inaccurate. I understand that Wells Fargo Advisors will rely on this information and that it is my responsibility to provide accurate and timely updates. My failure to do so may affect recommendations that are given to me related to my Priority Credit Line Account. If I decide to close or make changes to my Priority Credit Line Account, I will provide notification to Wells Fargo Advisors.

BY SIGNING THIS SIGNATURE PAGE, I/WE AUTHORIZE, ACKNOWLEDGE, AND AGREE TO THE TERMS AND CONDITIONS OF THE PRIORITY CREDIT LINE AGREEMENT AND TO THE FOLLOWING:

- **Stock Lending:** My securities may be loaned to Wells Fargo Clearing Services, LLC or to others.
- **Communications Consent:** My Financial Advisor may contact me/us as described in the Communications, Recording and Monitoring, Statements and Confirmations section of the Priority Credit Line Agreement.
- **PCL Account Holders:** In connection with my Priority Credit Line Account, Wells Fargo Bank, N.A. may establish a Bank Account in my/our name(s) and provide the banking-related services as set forth in the Priority Credit Line Account Agreement and may make any inquiry considered appropriate, including credit or other reports, to determine if the Bank Account should be opened. I/We also agree to the terms of the dispute resolution program described in the Priority Credit Line Account Agreement relating to disputes specifically involving the Bank Account.

W-9: (Not Applicable to W-8 Clients)

Payer's Request for Taxpayer Identification Number

Is this your correct Social Security/Tax ID?
If not, please enter the correct number in the appropriate boxes.

<input type="checkbox"/> Social Security	xxxx 3727
<input checked="" type="checkbox"/> Tax ID	
or <input checked="" type="checkbox"/> Corrected Social Security/Tax ID	
(Please omit dashes)	

Under penalties of perjury, I certify that:

- 1) The number shown on this form is my correct Taxpayer Identification Number (or I am waiting for a number to be issued to me); and
 - 2) I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
 - 3) I am a U.S. citizen or other U.S. person; and
 - 4) The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct. (NOT: The FATCA code is not applicable for accounts maintained in the United States.)
- ☐ Check here if you have been notified by the IRS that you are currently subject to backup withholding because of unreported interest or dividends on your tax return.

THE INTERNAL REVENUE SERVICE DOES NOT REQUIRE YOUR CONSENT TO ANY PROVISION OF THIS DOCUMENT OTHER THAN THE CERTIFICATIONS REQUIRED TO AVOID BACKUP WITHHOLDING.

THIS PRIORITY CREDIT LINE AGREEMENT CONTAINS A PRE-DISPUTE ARBITRATION CLAUSE LOCATED ON PAGE 4, PARAGRAPH C. BY EXECUTING THIS DOCUMENT CLIENT IS AGREEING TO BE BOUND BY THE PRE-DISPUTE ARBITRATION CLAUSE. THE UNDERSIGNED ACKNOWLEDGES RECEIPT OF A COPY OF THE PRIORITY CREDIT LINE AGREEMENT.

MUST SIGN AND DATE

I agree to the terms and conditions of this agreement and attest that the certification made of the W-9 above is true. (Not Applicable to W-8 Clients)

Signature of KEYVAN PARSA X	(Primary Owner) Use BLACK ink only.	Title if Applicable PCL	Date (Required) 08-07-20
I agree to the terms and conditions of this agreement.			
Signature of X		Title if Applicable	Date (Required)
Signature of X		Title if Applicable	Date (Required)
Signature of X		Title if Applicable	Date (Required)
Signature of X		Title if Applicable	Date (Required)

Investment and Insurance Products:

Not Insured by FDIC or any Federal Government Agency	May Lose Value	Not a Deposit of or	Guaranteed by a Bank or any Bank Affiliate
Wells Fargo Advisors is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.			

591213 (Rev 11 - 11/20)

* Total Supplemental Form(s) - 1, 1086

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WFGESGN

0080811608001

EXHIBIT A

75530087 WFGESGN 0080811608001